

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Trustee-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC,

Trustee,

v.

NATIXIS, NATIXIS CORPORATE &  
INVESTMENT BANK (f/k/a IXIS  
CORPORATE & INVESTMENT BANK),  
NATIXIS FINANCIAL PRODUCTS, INC.,  
BLOOM ASSET HOLDINGS FUND, and  
TENSYR LIMITED,  
Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05353 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO  
RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Trustee may respond to the Motions to Dismiss filed by Defendant Tensyr Limited (“Tensyr”) and Defendants Natixis S.A. (in its own capacity and as successor in interest to Defendant IXIS Corporate & Investment Bank) (“Natixis”), Natixis Financial Products LLC (as successor in interest to Natixis Financial Products Inc.) (“Natixis FP”) and Bloom Asset Holdings Fund (“Bloom”) (collectively, the “Natixis Defendants”) is extended up to and including March 10, 2017. It is further stipulated and agreed that Tensyr and the Natixis

Defendants shall file their respective replies by June 2, 2017. The pre-trial conference will be adjourned from June 28, 2017 at 10:00 a.m. to July 26, 2017 at 10:00 a.m. The return date for this matter was previously set for May 31, 2017 at 10:00 a.m. but will be rescheduled for June 28, 2017 at 10:00 a.m.

The purpose of this stipulated extension (the "Stipulation") is to provide adequate time to reach an agreed upon form of order consistent with the Memorandum Decision Regarding Claims to Recover Subsequent Transfers, dated November 21, 2016.

The extension of time granted by this Stipulation is without prejudice to any future extensions of time.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses the Trustee, the Natixis Defendants, and Tensyr may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction. Undersigned counsel for Tensyr and the Natixis Defendants acknowledge that they have previously waived any defenses based on insufficiency of process or insufficiency of service of process of the Summons and Complaint on behalf of Defendant Tensyr and Defendants Natixis, Natixis FP and Bloom.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 14447).

Dated: January 10, 2017  
New York, New York

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Liquidation of Bernard L. Madoff  
Investment Securities LLC and the estate  
of Bernard L. Madoff*

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own capacity and as successor in interest to  
IXIS Corporate & Investment Bank), Natixis  
Financial Products LLC (as successor in  
interest to Natixis Financial Products Inc.) and  
Bloom Asset Holdings Fund*

**SO ORDERED**

Dated: January 10<sup>th</sup>, 2017  
New York, New York

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE